

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	
	)	
ROBERT C. BLOM,	)	Case No. 21-04328
	)	Chapter 13
Debtor.	)	Hon. Donald R. Cassling
_____	)	
	)	
ASSET REMEDIATION, LLC,	)	
	)	Case No. 21-00120
Plaintiff,	)	
	)	
v.	)	
	)	
ROBERT C. BLOM,	)	
	)	
Defendant.	)	

**NOTICE OF MOTION**

To: See attached list

PLEASE TAKE NOTICE that on **September 23, 2021, at 10:00 a.m.** I will appear before the Honorable Donald R. Cassling, or any judge sitting in his place, and present **Asset Remediation, LLC's Motion for Default Judgment**, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance at the courthouse is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and passcode.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is **161 414 7941** and the passcode is **619**. The meeting ID and passcode can also be found on Judge Cassling's webpage on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of

Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Asset Remediation, LLC

By: /s/ Julia Jensen Smolka  
One of its attorneys

Julia Jensen Smolka, #6272466  
DiMonte & Lizak, LLC  
216 W. Higgins Road  
Park Ridge, IL 60068  
Phone: 847-698-9600  
Fax: 847-698-9623  
Email: [jsmolka@dimontelaw.com](mailto:jsmolka@dimontelaw.com)

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 8<sup>th</sup> day of September, 2021, she duly served (or caused to be served) upon the persons on the attached service list, by ordinary First-Class Mail unless such parties were electronically notified, together with a copy of **Asset Remediation, LLC's Motion for Default Judgment** and this Notice.

By: /s/ Julia Jensen Smolka

#### **Via ECF**

Patrick S. Layng  
United States Trustee, Region 11  
219 S. Dearborn Street #873  
Chicago, IL 60604

M.O. Marshall  
55 E. Monroe Street, Suite 3850  
Chicago, Illinois 60603

David M. Siegel  
David M. Siegel & Associates  
790 Chaddick Drive  
Wheeling, Illinois 60090

#### **Via First Class Mail**

Robert C. Blom  
425 N. Stephen Drive, Apt. 2  
Palatine, Illinois 60067

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ROBERT C. BLOM,	)	Case No. 21-04328
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ASSET REMEDIATION, LLC,	)	
	)	Case No. 21-00120
Plaintiff,	)	
	)	
v.	)	
	)	
ROBERT C. BLOM,	)	
	)	
Defendant.	)	

**ASSET REMEDIATION, LLC’S MOTION FOR DEFAULT JUDGMENT**

Creditor, Asset Remediation, LLC as assignee of Sound Royalty, LLC. ("Asset Remediation") by its attorney, Julia Jensen Smolka, request this Court seeks entry of an order for default judgment against Debtor Robert Blom (“Debtor”), and in support thereof, states as follows:

1. On July 28, 2021, Asset Remediation filed a multi-count adversary complaint to determine the debt to be non-dischargeable pursuant to 11 U.S.C. 523(a) [Dkt No. 1].
2. Asset Remediation’s complaint seeks a judgment exempt from discharge of certain debt due from the Defendant to Asset under 11 U.S.C. 523(a). The amount of the debt is \$109,803.23.
3. The summons was served via ECF and U.S. Mail [Dkt Nos. 2 and 3].
4. Counsel for Asset Remediation spoke to counsel for Debtor. Debtor’s counsel stated that they would not be appearing or defending the action.
5. As of the date of this motion, the Debtor has not appeared or filed an answer.

6. Asset is seeking judgment on Count I of its Complaint. Attached to this motion is a prove-up affidavit of Michael D'Amore, general counsel of Asset Remediation. See Prove-Up Declaration attached hereto as **Exhibit 1**.
7. Asset Remediation seeks an entry of an order for default judgment against Debtor, Robert C. Blom, and a finding that the debt, which is \$109,803.23 is exempted from discharge under 11 U.S.C. 523(a)(6).

Respectfully submitted,

Asset Remediation, LLC

By: /s/ Julia Jensen Smolka  
One of its attorneys

Julia Jensen Smolka  
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